

## Message

**From:** Reid,, Brad- NDEQ [/O=NPPD/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BRADREID]  
**Sent:** 4/18/2011 8:55:08 PM  
**To:** Citta Jr., Joseph L. [jlcitta@nppd.com]  
**CC:** Schneider,, Shelley- NDEQ [shelley.schneider@nebraska.gov]; Dodson, Joshua [joshua.dodson@nebraska.gov]; Prasai, Gyanendra [gyanendra.prasai@nebraska.gov]  
**Subject:** RE: NDEQ Ltr - NPPD's GGS Supplemental BART Assessment - DSI - RE: Mr. Reid's E-mail of 4-8-11

Thanks for the information, Joe. As we talked on the phone, I'm sending you a few discussion topics/questions that we talk about on a conference call later. Primarily we want to discuss the baselines used in the BART cost analysis and modeling analysis. What I understood from our brief conversation was that 1.7 lb-SO<sub>2</sub>/MMBtu was used as a baseline for the BART analyses, yet 0.749 was used as the modeling baseline. What doesn't seem to make sense is that in Exhibit 3 of the S&L report appears to show that the baseline of 0.749 was used for the scrubber baselines. For example, an emissions reduction of 39,000 tons of SO<sub>2</sub> for a Dry Scrubber (down to 0.15 lb/MMBtu) is not consistent with using a baseline of 1.7+, it is consistent with using a baseline of 0.7+.

1.7 lb/MMBtu \* 15,175 MMBtu/hr = 113,000 tpy uncontrolled SO<sub>2</sub> for both units.  
 0.749 lb/MMBtu \* 15,175 MMBtu/hr = 49,800 tpy uncontrolled SO<sub>2</sub> for both units  
 0.36 = 24,000 tpy SO<sub>2</sub>  
 0.15 = 10,000 tpy SO<sub>2</sub>

A reduction of 39,000 tpy SO<sub>2</sub> is realized when you drop from 0.749 down to 0.15. There is the confusion. It appears the baseline for the BART analysis is supposed to be 0.749 lb/MMBtu and represents the 2001-03 max 24-hr SO<sub>2</sub> emissions.

We also want to make sure we understand how much Trona you calculate needing (annual operating costs) to reduce emissions from 0.7+ down to 0.36 (~50% reduction).

Those are the main topics we need to discuss on the call. Let me know when we can get together to discuss. Thanks.

Brad Reid, Air Quality Division  
 Nebraska Dept. of Environmental Quality  
 (402) 471-4159 / 471-2909 fax

-----Original Message-----

From: Citta Jr., Joseph L. [mailto:jlcitta@nppd.com]  
 Sent: Friday, April 15, 2011 4:17 PM  
 To: Reid, Brad  
 Subject: NDEQ Ltr - NPPD's GGS Supplemental BART Assessment - DSI - RE: Mr. Reid's E-mail of 4-8-11  
 Importance: High

Brad: Attached is an electronic copy of the letter to you that I placed in the mail today. The letter is the reply to your DSI related questions contained in your 4/8/11 dated e-mail.

Please contact me with any questions you have.

Thanks!

Joe

Joe L. Citta Jr.  
 NPPD Corporate Environmental Manager  
 (402) 563-5355 / (402) 563-5168 fax  
 cell--(402) 910-8974

P Please consider the environment before printing this email.